

**REMARKS**

This Response is in reply to the Office Action dated October 5, 2006 ("OA"). In the Office Action, claims 1-32 were rejected under 35 USC §103(a). Claims 1-32 are believed allowable, with claims 1, 7, 11, 14, 18 and 21 being independent claims.

CLAIM REJECTIONS UNDER 35 USC §103:

Claims 1-32 were rejected under 35 USC §103 as obvious over U.S. Patent Application Publication No. US 2002/0007317 (hereinafter "Callaghan") in view of U.S. Patent No. 5,796,952 to Davis et al. (hereinafter "Davis") and further in view of U.S. Patent Application Publication No. US 2002/0023159 A1 (hereinafter "Vange"). A *prima facie* case for obviousness can only be made if the combined reference documents teach or suggest all the claim limitations. MPEP 2143. Furthermore, to establish a *prima facie* case of obviousness, there must be some suggestion or motivation to modify the reference or to combine reference teachings. MPEP 2143.

Claim 1:

Claim 1 recites, in part, "the first web server directing a client to access a resource at the second Web-Server; said resource encapsulating information about a location of the client record in the database . . . ." Thus, claim 1 requires that the location of a client record within a database is encapsulated within a resource which a client is directed to access. It is emphasized that the location of the client record, as opposed to the actual information contained within the client record, must be encapsulated within a resource to fulfill this limitation of claim 1. Furthermore, the mere presence of a database in which client records are stored clearly does not fulfill this limitation of claim 1.

Claim 1 additionally recites, "the second web server decapsulating the location and retrieving the client record from the database . . . ." It is evident due to antecedent basis that the location listed in this limitation is the same location as in the preceding limitation. Thus, claim 1 additionally requires that a second web server, at which is located a resource which a client is directed to access, decapsulates the location of a client record in a database from the resource and retrieves the client record from the database. As with the preceding limitation, the location of the client record, as opposed to the actual information contained within the

client record, must be decapsulated from a resource to fulfill this limitation of claim 1.

As conceded by the Examiner, Callaghan does not respond to the limitation of claim 1 requiring a resource encapsulating information about a location of a client record in a database. The Examiner similarly concedes that Callaghan does not respond to the limitation of claim 1 requiring decapsulating the location and retrieving the client record from the database. However, the Examiner alleges that Vange teaches these limitations. Specifically, the Examiner alleges that "Vange further teaches in paragraph 18 the encapsulation of parameter which is passed which stores information related to client record information which reads on 'said resource encapsulating information about a location of the client record in the database', 'the second web server decapsulating the location and retrieving the client record from the database' . . . ." OA, pg. 4.

The passage of Vange cited by the Examiner recites:

In operation, the interface receives a request from a user agent including domain-specific state information directed at the dynamically assigned domain. The first process converts the domain-specific state information into a parameter and passes the parameter back to the user agent with a redirection command instructing the user agent to generate a request to the statically defined domain. The user agent then generates a request to the second process including the parameter along with domain-specific state information associated with the statically defined domain. Vange, para. 0018.

The Applicant respectfully submits that the cited passage contains no teaching or suggestion of a resource encapsulating information about a location of a client record in a database. No mention is made that the request, the domain-specific state information, or the parameter encapsulates the location of a client record in the database. Furthermore, no other passage of Vange contains any teaching or suggestion of a client being directed to access a resource encapsulating information about a location of a client record in a database. Specifically, later passages of Vange providing additional detail about the contents of the request, the domain-specific state information and the parameter contain no mention of any of these entities encapsulating the location of a client record in the database.

The paragraph of Vange immediately following the passage cited by the Examiner discloses the operations performed by the second process upon the parameter:

The second process processes the parameter and the state information and passes the processed parameter back to the user agent together with domain-specific state information and a redirection command instructing the user agent to generate a request to the dynamically defined domain. The first process receives the request with the processed parameter, converts the processed parameter into domain-specific state information and returns the domain-specific state information to the user agent. Vange, para. 0019.

The Applicant respectfully submits that the cited passage contains no teaching or suggestion of decapsulating the location of a client record in a database and retrieving the client record from the database. It is noted that the term "processing" indicates the performance of operations but does not indicate any particular operation, manipulation or sequence thereof. Accordingly, the phrase "the second process processes the parameter" provides minimal information about the specific operations performed by the second process on the parameter. Such a broad statement clearly does not obviate the claim language wherein a second web server decapsulates the location and retrieves the client record from the database. Furthermore, no other passage of Vange contains any teaching or suggestion of a second web server, at which is located a resource which a client is directed to access, decapsulating the location of a client record in a database from the resource and retrieving the client record from the database.

Additionally, for the location of a client record in the database to be decapsulated from a resource, the location must first have been encapsulated in a resource. Therefore, unless the requirement of claim 1 that the location of a client record within a database is encapsulated within a resource is fulfilled, it is a logical impossibility to fulfill the requirement of claim 1 that the location of the client record within a database is decapsulated from a resource. It follows that the reasons why the combination cited by the Examiner fails to teach the limitation that the location of a client record within a database is encapsulated within a resource apply equally to the limitation that the location is decapsulated.

The Examiner alleges that "[i]n view of Callaghan and Davis, it would have been obvious for this parameter to include information pertaining to the client including client state information stored in the database." OA, pg.

4. Assuming *arguendo* that the combination cited by the Examiner is obvious, such a combination would fail to teach the limitation of claim 1 that the location of a client record within a database is encapsulated within a resource. This is because the parameter in the combination cited by the

Examiner includes the client state information itself, as opposed to the location thereof in the database. Therefore, including client state information stored in the database in a parameter is not equivalent to encapsulating within a resource information about a location of a client record in a database.

The Examiner further alleges that "[o]ne of ordinary skill in the art at the time of the applicant's invention would have found it useful to modify the combination as taught by Callaghan and Davis with the teachings of Vange, the database storage of client information method, with the parameter sharing as disclosed by Vange in order to be able to share client record information that is stored in a database accurately and securely." OA, pg. 4. The Applicant respectfully disagrees with the Examiner's conclusion.

Obviousness cannot be established by combining prior art to produce the claimed invention absent some teaching or suggestion supporting the combination. *In re Fritch*, 972 F.2d 1260, 1266, 23 USPQ2d 1780, 1783-84 (Fed. Cir. 1992). The mere fact that the prior art may be modified in the manner suggested by an Examiner not does make the modification obvious unless the prior art suggested the desirability of the modification. *Id.*

The preceding two cited passages of Vange are found in the summary and can therefore be construed as broad statements providing a general overview of the teachings of Vange. The following passage of Vange provides more specific details of the parameter sharing method taught therein:

At step 705, the global cookie update function is performed. In a preferred embodiment, the global cookie update function involves a redirection from front-end 201 to state management server 206, wherein the redirection additionally comprises appended parameter data. The parameter data provides state management server 206 with the domain-specific state information determined by front-end 201 during step 703. In step 705, updated global state information is determined, the domain-specific state information is updated, and the new domain-specific state information is returned to front-end 201. Update processes 705 may also include processes to update the state information, in the form of the global cookie and the domain-specific cookie, stored within a user agent 205. At the conclusion of step 705, the system proceeds to step 706 and the state information management processes are terminated. Vange, para. 0121.

The parameter disclosed in the passage cited by the Examiner transmits state information from the front-end to the state management server. Vange suggests that the front-end and state management server exist in different domains. The following passage clarifies Vange's intent: "The intermediary

computer executes a first process running within a dynamically assigned domain and a second process running within a statically defined domain. The first process and second process are configured to communicate domain-specific state information associated with their own domains with the user agents." Vange, para. 0017. The following passage provides additional clarification: "It should be understood that the global cookie will be sent irrespective of which dynamically assigned domain initiated the redirection. Hence, the state management server 206 is in possession of cross-domain state information." Vange, para. 0110. It follows that the parameter disclosed in the passage cited by the Examiner is a means to circumvent restrictions imposed by Internet protocols on transmitting cookies across domains. However, Callaghan also teaches a method to share state information across domains. Combining the method taught by Callaghan with the parameter sharing method taught by Vange is redundant because both methods exist to achieve the same object. Therefore, it is preposterous to assert that one of ordinary skill in the art would find it useful to combine the teachings of Callaghan with the parameter sharing method disclosed by Vange.

Furthermore, "Broad conclusory statements regarding the teaching of multiple references, standing alone, are not 'evidence.'" In re Dembicza, 175 F.3d 994, 999, 50 USPQ2d 1614, 1617 (Fed. Cir. 1999). "Mere denials and conclusory statements, however, are not sufficient to establish a genuine issue of material fact." Dembicza, 175 F.3d at 999, 50 USPQ2d at 1617, citing McElmurry v. Arkansas Power & Light Co., 995 F.2d 1576, 1578, 27 USPQ2d 1129, 1131 (Fed. Cir. 1993).

The Examiner's assertion that combining the method taught by Callaghan with the parameter sharing method taught by Vange would allow sharing information accurately and securely is conclusory. The Examiner has not explained, and it is not evident, why the method disclosed by Callaghan is insufficiently accurate or insufficiently secure. Furthermore, the Examiner has not explained, and it is not evident, why the parameter sharing disclosed by Vange offers increased accuracy or security relative to the teachings of Callaghan.

The Examiner further alleges that "one of ordinary skill in the art would have been motivated to make such a combination for the reasons stated above, wherein a user would be able to share private information in the form of cookies across domains . . . ." However, Callaghan by itself discloses a method to share cookies across domains. Cookies can store a wide variety of

information, including private information. Because Callaghan already discloses a means to accomplish the stated goal, it is redundant to combine the teachings of Callaghan with the teachings of Vange in order to achieve the same goal. It is therefore preposterous to assert that motivation exists to combine Callaghan and Vange to share private information in the form of cookies across domains.

Additionally, the Applicant respectfully submits that one skilled in the art would not be motivated to combine Callaghan's teaching of sharing state information across multiple domains with any teaching of encapsulating information about a location of a client record in the database. Callaghan teaches sharing the state information itself among multiple domains. By contrast, a location of a client record in the database provides sufficient information to access the information but does not itself contain the information. Because the state information of Callaghan is itself being shared, additionally sharing the location of the same information in a database provides no added benefit because the information which can be accessed at the location is already shared. Therefore, no motivation exists to additionally provide the location of the information.

For at least these reasons, the Applicant respectfully submits that claim 1 is not obvious over Callaghan in view of Davis and further in view of Vange and earnestly solicits allowance of the claim.

Claim 11:

Claim 11 recites, in part, ". . . said resource encapsulating information about a location of the client record in the database . . . ." Claim 11 further recites, in part, ". . . the second web server decapsulating the location and retrieving the client record from the database . . . ." It is emphasized that the cited claim limitations are substantially identical to limitations of claim 1.

In rejecting claim 11, the Office Action alleges the same argument as presented for claim 1. OA, pg. 3-4. For the reasons previously discussed regarding claim 1, this argument fails to obviate the claim limitations cited above. Additionally, the reasons why combining Callaghan and Vange is not obvious discussed above regarding claim 1 apply equally to claim 11.

For at least these reasons, the Applicant respectfully submits that claim 11 is not obvious over Callaghan in view of Davis and further in view of Vange and earnestly solicits allowance of the claim.

Claim 14:

Claim 14 recites, in part, ". . . said resource encapsulating information about a location of the client record in the database . . . ." Claim 14 further recites, in part, ". . . the second user tracker decapsulating the location and retrieving the client record from the database . . ." It is emphasized that the cited claim limitations are substantially identical to limitations of claim 1, with the exception that the client record is decapsulated by a user tracker instead of a web server.

In rejecting claim 14, the Office Action alleges the same argument as presented for claim 1. OA, pg. 3-4. In the argument presented above regarding claim 1, it is immaterial whether the decapsulating operation is performed by a web server, a user tracker or another technological device. Therefore, for the reasons previously discussed regarding claim 1, the Examiner's argument fails to obviate the claim limitations cited above. Additionally, the reasons why combining Callaghan and Vange is not obvious discussed above regarding claim 1 apply equally to claim 14.

For at least these reasons, the Applicant respectfully submits that claim 14 is not obvious over Callaghan in view of Davis and further in view of Vange and earnestly solicits allowance of the claim.

Claim 21:

Claim 21 recites, in part, ". . . said resource to encapsulate information about a location of the client record in the database . . . ." Claim 21 further recites, in part, ". . . the second web server to decapsulate a location and retrieve the client record from the database . . ." It is emphasized that the cited claim limitations are substantially identical to limitations of claim 1.

In rejecting claim 21, the Office Action alleges the same argument as presented for claim 1. OA, pg. 3-4. For the reasons previously discussed regarding claim 1, this argument fails to obviate the claim limitations cited above. Additionally, the reasons why combining Callaghan and Vange is not obvious discussed above regarding claim 1 apply equally to claim 21.

For at least these reasons, the Applicant respectfully submits that claim 21 is not obvious over Callaghan in view of Davis and further in view of Vange and earnestly solicits allowance of the claim.

Claim 2:

Claim 2 is dependent on and further limits claim 1. Since claim 1 is believed allowable, claim 2 is believed allowable for at least the same reasons as claim 1.

Claim 3:

Claim 3 is dependent on claim 1 and recites, "A method as recited in 1, wherein the first web server authenticates the client, and the client record includes user authentication data enabling the second web server to use a common sign-on with the sign-on of the first web server." Thus, claim 3 requires the first web server to authenticate the client. Furthermore, the first web server of claim 3 is equivalent to the first web server of claim 1. This is evident both from the dependency of claim 3 on claim 1 and from antecedent basis. It is further noted that because claim 3 depends on claim 1, a reference or an allowable combination thereof must teach or suggest not only the requirements of claim 3 but also the requirements of claim 1 in order to fulfill the requirements of claim 3.

In rejecting claim 3, the Examiner alleges that "Callaghan, Davis and Vange teach the method wherein the first web server authenticates the client . . . (Callaghan, p. 6, para. 0085-0087.)" OA, pg. 5. The Applicant respectfully disagrees with the Examiner's conclusion.

The passage of Callaghan immediately following the passage cited by the Examiner clarifies relevant details of the authentication method disclosed by Callaghan. This passage recites:

When the proxy server receives request 724, the proxy server replaces the "random=random1" cookie with the credentials (e.g., userid and password) associated at 716 with random1, and sends request 730 (FIG. 7b) to the appropriate WWW server. If the credentials are valid, the WWW server returns response 732 to the proxy server, with a response code of 200 (OK). Callaghan, para. 0088.

The preceding passage clarifies that the WWW server, as opposed to the proxy server, determines the validity of the credentials. Thus, the WWW server, as opposed to the proxy server, authenticates the client. Therefore, the authentication method disclosed by Callaghan cannot teach the limitation of claim 3 that the first web server authenticates the client unless the "WWW server" in the cited passage of Callaghan is equivalent to the first web server of claim 3.

In response to claim 1, the Examiner alleges that Callaghan teaches "wherein the first web server uses a first user tracking mechanism to collect client information (p. 3, par. 0049 and 0050) and stores the client information as a client record in a database (p. 3 par. 0043, p. 4 par. 0053, and p. 8, par. 0117)." OA, pg. 3. One passage cited by the Examiner recites:

Although the request is ultimately for server "www.ibm.com", the request is received by proxy server 202, as shown in FIG. 2 (i.e., the arrow at 208 stops at the proxy server). At the proxy server, a determination is made as to whether there is state information associated with this particular URL, "http://www.ibm.com/pgm3.exe". In order to make this determination, the proxy server uses a state table maintained by the proxy server. The state table includes the URL (e.g., http://www.ibm.com/pgm3.exe), or at least a part of it, and the state (e.g., state1). When the proxy server receives a request, it searches the state table to determine if the URL of the request matches a URL within the state table. If such a match exists, as in this example, then there is state information associated with that URL. Callaghan, para. 0053 (emphasis added).

In the preceding passage, the disclosed operations are being performed by the proxy server. Furthermore, the proxy server maintains the client state information. The Examiner alleges that the cited passage fulfills the requirements of claim 1 for the first web server. Thus, the passage cited by the Examiner cannot teach the limitation of claim 1 unless the proxy server taught by Callaghan is equivalent to the first web server of claim 1.

However, as previously noted, the Examiner's allegation regarding claim 3 cannot be valid unless the "WWW server" taught by Callaghan is equivalent to the first web server of claim 3. Furthermore, the Examiner's allegation regarding claim 1 cannot be valid unless the "proxy server" taught by Callaghan is equivalent to the first web server of claim 1. However, the first web server of claim 1 is equivalent to the first web server of claim 3. Because the "WWW server" and "proxy server" taught by Callaghan are distinct, it is logically impossible for both servers to be equivalent to the first web server. It follows that the Examiner's allegations cannot both be valid. The Applicant therefore respectfully submits that Callaghan does not teach or suggest a first web server authenticating a client as required by claim 3.

In rejecting claim 3, the Examiner further alleges a rationale and motivation for combining Callaghan and Vange which is substantially similar to the rationale and motivation presented in the Examiner's argument

regarding claim 1. The reasons presented above regarding claim 1 as to why combining Callaghan and Vange is not obvious apply equally to claim 3.

For at least these reasons, the Applicant respectfully submits that claim 3 is not obvious over Callaghan in view of Davis and further in view of Vange and earnestly solicits allowance of the claim.

Claim 4:

In rejecting claim 4, the Examiner alleges that Callaghan discloses the limitations on page 1, paragraphs 4 and 5. The Applicants respectfully disagree with such a conclusion.

Paragraphs 4 and 5 of Callaghan recite,

As described by Netscape, cookies are a general mechanism used by server side connections (such as CGI scripts) to both store and retrieve information on the client side of the connection. A server, when returning an HTTP object to a client, may also send a piece of state information which the client will store. Included in that state object is a description of the range of Uniform Resource Locators (URLs) for which that state is valid. Any future HTTP requests made by the client which fall in that range will include a transmittal of the current value of the state object from the client back to the server. The state object is called a cookie, for no compelling reason.

This mechanism provides a powerful tool which enables a host of new types of applications to be written for web-based environments. A common example of an application that uses cookies is a "virtual shopping mall". As a user browses through a store of an on-line shopping mall and decides to purchase certain items, those items are added to the user's "shopping cart". Specifically, a list of the chosen items is kept in the browser's cookie file (i.e., the "shopping cart"), so that all of the items can be paid for when shopping within that particular store is complete. Callaghan, par. 4-5 (emphasis added).

The above passage is offered by the Examiner as teaching that a "first web server stores within the client record at least one parameter which determines at least one characteristic of at least one page to be sent to the client by the second web server." App., claim 4. The cited passage discusses the original cookie specification by Netscape Communications Corporation. An inherent feature of the original specification is the limitation of a cookie to, at most, a single domain. The cited work mentions this limitation, stating that "[o]nly hosts within the specified domain can set a cookie for a domain . . ." Callaghan, par. 9.

However, claim 4 is concerned with maintaining user information across multiple domains, reciting, "A method as recited in 1, wherein the first web server stores within the client record at least one parameter which

determines at least one characteristic of at least one page to be sent to the client by the second web server." It is therefore respectfully submitted that the original Netscape specification discussed by the cited passage cannot teach or suggest managing user information determining at least one characteristic of at least one page across multiple domains.

Additionally, claim 4 is dependent on and further limits claim 1. Since claim 1 is believed allowable, claim 4 is also believed allowable for the reason just discussed and at least the same reasons as claim 1.

Claim 5:

Claim 5 is dependent on claim 4 and recites, "A method as recited in 4, wherein said at least one parameter includes at least one user preference." It is emphasized that claim 5 requires the existence of at least one user preference.

In rejecting claim 5, the Examiner alleges that "Callaghan, Davis and Vange teach the method parameter includes at least one user preference (Callaghan, p. 1, para. 0004-0005.)" OA, pg. 5. The Applicant respectfully disagrees with the Examiner's conclusion.

The passage cited by the Examiner recites:

As described by Netscape, cookies are a general mechanism used by server side connections (such as CGI scripts) to both store and retrieve information on the client side of the connection. A server, when returning an HTTP object to a client, may also send a piece of state information which the client will store. Included in that state object is a description of the range of Uniform Resource Locators (URLs) for which that state is valid. Any future HTTP requests made by the client which fall in that range will include a transmittal of the current value of the state object from the client back to the server. The state object is called a cookie, for no compelling reason.

This mechanism provides a powerful tool which enables a host of new types of applications to be written for web-based environments. A common example of an application that uses cookies is a "virtual shopping mall". As a user browses through a store of an on-line shopping mall and decides to purchase certain items, those items are added to the user's "shopping cart". Specifically, a list of the chosen items is kept in the browser's cookie file (i.e., the "shopping cart"), so that all of the items can be paid for when shopping within that particular store is complete. Callaghan, para. 0004-0005.

The Applicant respectfully submits that the cited passage contains no teaching or suggestion of a user preference. Therefore, it is evident that the cited passage does not fulfill the limitation of claim 5 wherein said at least one parameter includes at least one user preference.

In rejecting claim 5, the Examiner further alleges a rationale and motivation for combining Callaghan and Vange which is substantially similar to the rationale and motivation presented in the Examiner's argument regarding claim 1. The reasons presented above regarding claim 1 as to why combining Callaghan and Vange is not obvious apply equally to claim 5.

For at least these reasons, the Applicant respectfully submits that claim 5 is not obvious over Callaghan in view of Davis and further in view of Vange and earnestly solicits allowance of the claim.

Claim 6:

Claim 6 is dependent on and further limits claim 5. Since claim 5 is believed allowable, claim 6 is believed allowable for at least the same reasons as claim 5.

Claim 7:

Claim 7 recites, in part, ". . . creating a link to the second web server that encapsulates information about a location of the client record in the database . . ." Thus, claim 7 requires that the location of a client record in a database is encapsulated within a link. It is emphasized that the location of the client record, as opposed to the actual information contained within the client record, must be encapsulated within a link to fulfill this limitation of claim 7.

In rejecting claim 7, the Office Action alleges that Vange teaches the limitation of claim 7 cited above. OA, pg. 6. The Applicant respectfully disagrees with the Examiner's conclusion.

As conceded by the Examiner, Callaghan does not respond to the limitation of claim 7 requiring creating a link to the second web server that encapsulates information about a location of a client record in a database. However, the Examiner alleges that Vange teaches these limitations. Specifically, the Examiner alleges that "Vange further teaches in paragraph 18 the encapsulation of parameter which is passed which stores information related to client record information which reads on 'creating a link to the second web server that encapsulates information about a location of the client record in the database.'" OA, pg. 7.

The passage of Vange cited by the Examiner recites:

In operation, the interface receives a request from a user agent including domain-specific state information directed at the dynamically

assigned domain. The first process converts the domain-specific state information into a parameter and passes the parameter back to the user agent with a redirection command instructing the user agent to generate a request to the statically defined domain. The user agent then generates a request to the second process including the parameter along with domain-specific state information associated with the statically defined domain. Vange, para. 0018.

The Applicant respectfully submits that the cited passage contains no teaching or suggestion of a link encapsulating information about a location of a client record in a database. No mention is made that the request, the domain-specific state information, or the parameter encapsulates the location of a client record in the database. Furthermore, no other passage of Vange contains any teaching or suggestion of creating a link encapsulating information about a location of a client record in a database. Specifically, later passages of Vange providing additional detail about the contents of the request, the domain-specific state information and the parameter contain no mention of any of these entities encapsulating the location of a client record in the database.

In rejecting claim 7, the Examiner further alleges a rationale and motivation for combining Callaghan and Vange which is substantially similar to the rationale and motivation presented in the Examiner's argument regarding claim 1. The reasons presented above regarding claim 1 as to why combining Callaghan and Vange is not obvious apply equally to claim 7.

For at least these reasons, the Applicant respectfully submits that claim 7 is not obvious over Callaghan in view of Davis and further in view of Vange and earnestly solicits allowance of the claim.

Claims 8-10:

Claims 8-10 are dependent on and further limit claim 7. Since claim 7 is believed allowable, claims 8-10 are believed allowable for at least the same reasons as claim 7.

Claims 12 and 15:

Claims 12 and 15 are dependent on and further limit claim 1. Since claim 1 is believed allowable, claims 12 and 15 are believed allowable for at least the same reasons as claim 1.

Claims 13 and 16:

Claims 13 and 16 are dependent on and further limit claim 7. Since claim 7 is believed allowable, claims 13 and 16 are believed allowable for at least the same reasons as claim 7.

Claim 17:

Claim 17 is dependent on and further limits claim 11. Since claim 11 is believed allowable, claim 17 is believed allowable for at least the same reasons as claim 11.

Claim 22:

Claim 22 is dependent on and further limits claim 21. Since claim 21 is believed allowable, claim 22 is believed allowable for at least the same reasons as claim 21.

Claim 18:

Claim 18 recites, in part, "mapping a first identity in the first private cookie and a second identity in the second private cookie to a single identity common across the multiple domains."

Claim 18 further recites, in part, ". . . creating a link to the second web server that encapsulates information about a location of the client record in the database . . . ." It is emphasized that the cited claim limitation is substantially identical to a limitation of claim 7.

In rejecting claim 18, the Examiner alleges that Callaghan teaches mapping a first identity in the first private cookie and a second identity in the second private cookie to a single identity common across the multiple domains. OA, pg. 8. In support of this position, the Examiner cites the following passage of Callaghan. *Id.*

Although the request is ultimately for server "www.ibm.com", the request is received by proxy server 202, as shown in FIG. 2 (i.e., the arrow at 208 stops at the proxy server). At the proxy server, a determination is made as to whether there is state information associated with this particular URL, "http://www.ibm.com/pgm3.exe". In order to make this determination, the proxy server uses a state table maintained by the proxy server. The state table includes the URL (e.g., http://www.ibm.com/pgm3.exe), or at least a part of it, and the state (e.g., state1). When the proxy server receives a request, it searches the state table to determine if the URL of the request matches a URL within the state table. If such a match exists, as in this example, then there is state information associated with that URL. Callaghan, para. 0053.

The Applicant respectfully submits that the cited passage contains no teaching or suggestion of mapping a first identity in the first private cookie and a second identity in the second private cookie to a single identity common across the multiple domains. The cited passage of Callaghan teaches that different state information may be associated with different URL's. However, no teaching or suggestion is made of an identity in the state information for a URL and another identity in the state information for another URL being mapped to a single identity common across both URL's.

The Examiner further alleges that Vange teaches creating a link to the second web server that encapsulates information about a location of the client record in the database. OA, pg. 9. The Applicant respectfully disagrees with the Examiner's conclusion.

As conceded by the Examiner, Callaghan does not respond to the limitation of claim 18 requiring creating a link to the second web server that encapsulates information about a location of a client record in a database. However, the Examiner alleges that Vange teaches this limitation. Specifically, the Examiner alleges that "Vange further teaches in paragraph 18 the encapsulation of parameter which is passed which stores information related to client record information which reads on 'creating a link to the second web server that encapsulates information about a location of the client record in the database.'" OA, pg. 9. The reasons presented above regarding claim 7 as to why Vange does not teach or suggest the cited claim limitation apply equally to claim 18.

In rejecting claim 18, the Examiner further alleges a rationale and motivation for combining Callaghan and Vange which is substantially similar to that presented in the Examiner's argument regarding claim 1. The reasons presented above regarding claim 1 as to why combining Callaghan and Vange is not obvious apply equally to claim 18.

For at least these reasons, the Applicant respectfully submits that claim 18 is not obvious over Callaghan in view of Davis and further in view of Vange and earnestly solicits allowance of the claim.

Claims 19-20:

Claims 19-20 are dependent on and further limit claim 18. Since claim 18 is believed allowable, claims 19-20 are believed allowable for at least the same reasons as claim 1.

Claim 23:

Claim 23 is dependent on and further limits claim 1. Since claim 1 is believed allowable, claim 23 is believed allowable for at least the same reasons as claim 1.

Claim 25:

Claim 25 is dependent on and further limits claim 7. Since claim 7 is believed allowable, claim 25 is believed allowable for at least the same reasons as claim 7.

Claim 27:

Claim 27 is dependent on and further limits claim 11. Since claim 11 is believed allowable, claim 27 is believed allowable for at least the same reasons as claim 11.

Claim 29:

Claim 29 is dependent on and further limits claim 14. Since claim 14 is believed allowable, claim 29 is believed allowable for at least the same reasons as claim 14.

Claim 24:

Claim 24 is dependent on and further limits claim 1. Since claim 1 is believed allowable, claim 24 is believed allowable for at least the same reasons as claim 1.

Claim 26:

Claim 26 is dependent on and further limits claim 7. Since claim 7 is believed allowable, claim 26 is believed allowable for at least the same reasons as claim 7.

Claim 28:

Claim 28 is dependent on and further limits claim 11. Since claim 11 is believed allowable, claim 28 is believed allowable for at least the same reasons as claim 11.

Claim 30:

Claim 30 is dependent on and further limits claim 14. Since claim 14 is believed allowable, claim 30 is believed allowable for at least the same reasons as claim 14.

Claim 31:

Claim 31 is dependent on and further limits claim 18. Since claim 18 is believed allowable, claim 31 is believed allowable for at least the same reasons as claim 18.

Claim 32:

Claim 32 is dependent on and further limits claim 21. Since claim 21 is believed allowable, claim 32 is believed allowable for at least the same reasons as claim 21.

**CONCLUSION**

In view of the forgoing remarks, it is respectfully submitted that this case is now in condition for allowance and such action is respectfully requested. If any points remain at issue that the Examiner feels could best be resolved by a telephone interview, the Examiner is urged to contact the attorney below.

No fee is believed due with this Amendment, however, should such a fee be required please charge Deposit Account 50-0510 the required fee. Should any extensions of time be required, please consider this a petition thereof and charge Deposit Account 50-0510 the required fee.

Respectfully submitted,



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